

Celia Nogales
Federal Regulatory Relations

1275 Pennsylvania Avenue, N.W., Suite 400
Washington, D.C. 20004
(202) 383-6473

PACIFIC X TELESIS
Group - Washington

June 17, 1992

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JUN 17 1992

Federal Communications Commission
Office of the Secretary

Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Ms Searcy:

Re: *CC Docket No. 92-77 - Billed Party Preference for 0+ InterLATA Calls*

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of its "Reply Comments Regarding Proprietary Calling Cards And 0+ Access" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,



Enclosures

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JUN 17 1992

Before the
Federal Communications Commission
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Billed Party Preference)
for 0+ InterLATA Calls)
_____)

CC Docket No. 92-77

REPLY COMMENTS OF PACIFIC BELL AND
NEVADA BELL REGARDING PROPRIETARY
CALLING CARDS AND 0+ ACCESS

Pacific Bell and Nevada Bell (the "Pacific Companies") hereby submit their Reply Comments on the issues identified for expedited consideration in the Commission's Notice of Proposed Rulemaking issued May 8, 1992 ("NPRM").

The Pacific Companies' proposed solution would open up validation for interLATA 0+ calling cards. It does not force any party to do anything; it simply requires those interLATA carriers that want to offer 0+ dialing to make their validation data available to others. Otherwise they should instruct their card users to dial their access code. The consumer is given the choice of using a proprietary or nonproprietary card using the dialing patterns required to reach his or her choice of carrier and/or features. Furthermore, no significant network changes are required. Additionally, the solution is easy to implement and would not have a detrimental effect on, or inconvenience, consumers.

AT&T's customers would be able to dial 0+ on all lines presubscribed to AT&T. They would be able to continue to dial 0+ on all intraLATA calls. When calling from stations presubscribed to other carriers, the customer could dial 0+ and have the call completed or, if the consumer desires, use 10288 as he does today. The proposal allows the consumer to always dial 0+ and have calls completed even if not calling from an AT&T line. In this way, the market should see increased competition in presubscriptions and no one interexchange carrier ("IXC") would be able to use its calling card base to inappropriately dominate another market.

Virtually all Comments filed in this expedited portion of the NPRM recognized that consumers benefit from 0+ dialing. If an IXC wishes to offer its customers 0+ dialing, the IXC should be required to provide access to their validation data to other IXCs under appropriate billing and collection agreements. If all IXCs opened their data to all others, consumers could use 0+ dialing all the time. For those IXCs that choose not to make their validation data available, they could offer a proprietary card and instruct their users to dial an access code.

Contrary to the concerns raised by some of the commenting parties,¹ the solution outlined in Pacific's 0+ interLATA calling card mutuality scenario need not mandate access code dialing. Carriers would be able to choose whether or not to offer a nonproprietary card. If they choose to offer one with 0+ dialing capability, then they would need to allow access to their data to others.

Some commenters stated their concerns that costly network changes would be necessary to route calls based on whether they were placed using 0+ or 10XXX dialing. Many also suggested that calls would need to be rejected if they used 0+ dialing with a proprietary card. Pacific's proposal would not insist that such calls be blocked or that extensive network changes be made. By not insisting that customers' calls be rejected in the event they mistakenly dial 0+ when using a proprietary card on a presubscribed carrier's line--and the presubscribed carrier is also the card issuer--there will be little changes required in any carrier's network. In other words, AT&T would not have to screen 0+ calls from 10288 calls if the end user dialed 0+ using a proprietary card. Therefore, there would not be any significant network costs or rearrangements necessary. Furthermore, the software upgrades

¹ See, e.g., Initial Comments of Bell Atlantic at 2; Comments of SDN Users Association, Inc. at 3; Comments of Nynex Telephone Companies at 2.

cited by AT&T, NYNEX and Southwestern Bell would not be necessary.²

Thus, under Pacific's approach, AT&T would not need to distinguish a customer's dialing pattern at its OSS switch. AT&T would be able to handle all calls routed to it whether access code dialed or 0+ dialed.³ Customers would not be adversely affected because they would be able to complete calls as they do today even if they do not follow the dialing instructions provided by AT&T's written notice.

If AT&T decides to continue to deny IXC's access to its validation data, it must notify its customers that they should dial access codes. Any new cards issued should have new dialing instructions printed on the back. Embedded customers should be notified in writing of the access code dialing instructions. Additionally, AT&T should not be able to advertise, or hold out, the availability of 0+ dialing with its calling cards unless it opens up its validation data. If AT&T opens its data to other IXC's and OSP's, then no changes to its dialing directions would be necessary.

Whether the Commission accepts Pacific's proposal or not, it should adopt Southwestern Bell's, Bell Atlantic's and NYNEX's requirement that AT&T notify all of its CIID card

² AT&T Comments at 8-9, Comments of the NYNEX Telephone Companies at 2-3, Comments of Southwestern Bell Telephone Company at 6.

³ But see, e.g., AT&T Comments at 8-9.

holders that line number based calling cards still work on all local exchange networks in addition to virtually all IXC networks--including AT&T's network.⁴

Pacific's proposal is simple. It is not costly, and it gives choices to both card issuers and consumers. Network changes are minimal, and the payphone presubscription inequities are minimized. Requiring carriers to open validation data allows 0+ dialing to continue and be expanded to all IXCs, who may so far not seen a reason to offer CIID format calling cards.

⁴ Southwestern Bell Comments at 4; Initial Comments of Bell Atlantic at 4; Comments of the NYNEX Telephone Companies at 3.

CONCLUSION

0+ interLATA calling card mutuality, as outlined in Pacific's comments, is not only technically and economically feasible, it is desirable. Carriers and consumers can freely decide whether to offer, or use, proprietary access code cards or nonproprietary 0+ cards. It offers an additional choice to the consumer--universal 0+ dialing--without taking anything away. It is a logical, swift interim alternative to Billed Party Preference which, the commenters agree, could take several years to accomplish.

Respectfully submitted

PACIFIC BELL
NEVADA BELL



JAMES P. TUTHILL
NANCY C. WOOLF
THERESA L. CABRAL

140 New Montgomery Street, Room 1523
San Francisco, California 94105
(415) 542-7657

JAMES L. WURTZ

1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
(202) 383-6474

Their Attorneys

Date: June 17, 1992

CERTIFICATE OF SERVICE

I, S. L. McGreevy, hereby certify that copies of the foregoing **"REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL"** were served by hand or by first-class United States mail, postage prepaid, upon the parties appearing on the attached service list this 17th day of June, 1992.

By: *S. L. McGreevy*
S. L. McGreevy

PACIFIC BELL
140 New Montgomery Street
San Francisco, California 94105

SERVICE LIST - CC DOCKET NO. 92-77

Cheryl A. Tritt, Chief *
Common Carrier Bureau
Federal Communications
Commission
1919 M St., N.W., Rm. 500
Washington, D.C. 20554

Gregory J. Vogt, Chief*
Tariff Division
Common Carrier Bureau
Federal Communications
Commission
1919 M St., N. W., Rm. 518
Washington, D.C. 20554

Colleen Boothby, Deputy Chief*
Tariff Division
Federal Communications
Commission
1919 M Street, N. W., Rm. 518
Washington, D.C. 20554

Judy Nitsche, Chief*
Tariff Review Branch
Federal Communications
Commission
1919 M Street, N. W., Rm. 518
Washington, D.C. 20554

Policy & Program Planning Division*
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 544
Washington, D.C. 20554

Downtown Copy Center*
1919 M Street, N. W.
Room 246
Washington, D.C. 20036

Francine J. Berry
Mark C. Roseblum
Peter H. Jacoby
Richard H. Rubin
Attorneys for the AMERICAN
TELEPHONE AND TELEGRAPH COMPANY
295 North Maple Ave., Room 3244J1
Basking Ridge, New Jersey 07920

Durward D. Dupre
Richard C. Hartgrove
John Paul Walters, Jr.
Attorneys for SOUTHWESTERN
BELL TELEPHONE COMPANY
1010 Pine Street, Room 2114
St. Louis, Missouri 63101

William E. Wyrough, Jr.
Associate General Counsel
FLORIDA PUBLIC SERVICE COMMISSION
101 East Gaines Street
Tallahassee, Florida 32399-0850

Andrew D. Lipman
Robert G. Berger
Swindler & Berlin, Chtd.
Counsel for COASTAL AUTOMATED
COMMUNICATIONS CORP. AND
EASTERN TELECOM CORPORATION
3000 K Street, N. W., Suite 300
Washington, D.C. 20007

* Hand Delivered

Amy S. Gross
Joseph M. Sandri, Jr.
NYCOM Information Services, Inc.
5 High Ridge Park
Stamford, Connecticut 06905

Susan M. Shahaman
Attorney for CENTRAL ATLANTIC
PAYPHONE ASSOCIATION
21 North 4th Street
Harrisburg, Pa. 17101

David Cosson
Attorney
Steven E. Watkins
Sr. Industry Specialist
NATIONAL TELEPHONE COOPERATIVE
ASSOCIATION
2626 Pennsylvania Ave., N. W.
Washington, D.C. 20037

Gail L. Polivy
Attorney for GTE SERVICE
CORPORATION
1850 M Street, N. W.
Suite 1200
Washington, D. C. 20036

John F. Dodd
Brad I. Pearson
SMITH, GILL, FISHER & BUTTS,
a Professional Corporation
Attorneys for INDEPENDENT TELE-
COMMUNICATIONS NETWORK, INC.
1200 Main Street, 35th Floor
Kansas City, MO 64105-2152

Richard E. Wiley
Danny E. Adams
Steven A. Augustino
WILEY, REIN & FIELDING
1776 K Street, N. W.
Washington, D.C. 20006
Attorneys for COMPETITIVE
TELECOMMUNICATIONS
ASSOCIATION

Genevieve Morelli
Vice President and
General Counsel
COMPETITIVE TELECOMMUNICATIONS
ASSOCIATION
1140 Connecticut Av., N.W., Ste. 220
Washington, D. C. 20036

Floyd S. Keene
Michael S. Pabian
Attorneys for AMERITECH
OPERATING COMPANIES
2000 W. Ameritech Center Dr.
Room 4H76
Hoffman Estates, IL 60196-1025

Albert H. Kramer
Robert F. Aldrich
KECK, MAHIN & CATE
Attorneys for the AMERICAN PUBLIC
COMMUNICATIONS COUNCIL
1201 New York Avenue, N. W.
Penthouse Suite
Washington, D.C. 20005-3919

Carol F. Sulkes
Vice President - Regulatory
Policy
CENTRAL TELEPHONE COMPANY
8745 Higgins Road
Chicago, Illinois 60631

John M. Goodman
Attorney for the BELL ATLANTIC
TELEPHONE COMPANIES
1710 H Street, N. W.
Washington, D. C. 20006

Patrick A. Lee
William J. Balcerski
Attorneys for NEW YORK
TELEPHONE COMPANY AND
NEW ENGLAND TELEPHONE AND
TELEGRAPH COMPANY
120 Bloomingdale Road
White Plains, NY 10605

Jo Campbell
Commissioner
PUC OF TEXAS
7800 Shoal Creek Blvd.
Suite 400N
Austin, Texas 78757

Marta Greytok
Commissioner
PUC OF TEXAS
7800 Shoal Creek Blvd.
Suite 400N
Austin, Texas 78757

Robert W. Gee
Chairman
PUC OF TEXAS
7800 Shoal Creek Blvd.
Suite 400N
Austin, Texas 78757

Rowland L. Curry
Director
Telephone Utility Analysis Div.
PUC OF TEXAS
7800 Shoal Creek Blvd.
Austin, Texas 78757

Judith St. Ledger-Roty
Michael R. Wack
REED SMITH SHAW & McCLAY
Attorneys for INTELICAL, INC.
1200 18th Street, N. W.
Washington, D.C. 20036

Mary J. Sisak
Donald J. Elardo
Attorneys for MCI
TELECOMMUNICATIONS CORP.
1801 Pennsylvania Ave., N. W.
Washington, D.C. 20006

Randolph J. May
David A. Gross
Elizabeth C. Buckingham
SUTHERLAND, ASBILL & BRENNAN
Attorneys for CAPITAL NETWORK
SYSTEM, INC.
1275 Pennsylvania Av., N. W.
Washington, D. C. 20004-2404

H. Richard Juhnke
Jay C. Keithley
Attorneys for UNITED
TELECOMMUNICATIONS, INC.
1850 M Street, N. W.
11th Floor
Washington, D. C. 20036

Deborah Barrett
Vice President
ONE CALL COMMUNICATIONS, INC.
d/b/a OPTICOM
801 Congressional Blvd., Suite 100
Carmel, Indiana 46032

William B. Barfield
Richard M. Sbaratta
Helen A. Shockey
Attorneys for BELLSOUTH
TELECOMMUNICATIONS, INC.
1155 Peachtree St., N.E.,
Suite 1800
Atlanta, Georgia 30367-6000

Douglas F. Brent
Associate Counsel
ADVANCED TELECOMMUNICATIONS CORP.
AMERICALL SYSTEMS, INC.
FIRST PHONE OF NEW ENGLAND, INC.
10000 Shelbyville Road, Suite 110
Louisville, Kentucky 40223

Lawrence E. Sarjeant
Randall S. Coleman
Attorneys for US WEST
COMMUNICATIONS, INC.
1020 19th Street, N. W.
Suite 700
Washington, D. C. 20036

Douglas N. Owens
Attorney for NORTHWEST
PAY PHONE ASSOCIATION
4705 16th Ave., N. E.
Seattle, Washington 98105

Mitchell F. Brecher
DOW, LOHNES & ALBERTSON
Attorneys for PHONETEL
TECHNOLOGIES, INC.
1255 Twenty-third St., N. W.
Washington, D. C. 20554

Jean L. Kiddoo
Ann P. Morton
SWINDLER & BERLIN, CHTD.
Counsel for ZERO PLUS
DIALING, INC., CLEARTEL
COMMUNICATIONS, INC. AND
COM SYSTEMS, INC.
3000 K Street, N. W., Suite 300
Washington, D. C. 20007

Alan W. Saltzman
Senior Vice President
ZERO PLUS DIALING, INC.
9311 San Pedro, Suite 300
San Antonio, TX 78216

W. Audie Long, Esq.
Kenneth F. Melley, Jr.
U. S. LONG DISTANCE, INC.
9311 San Pedro
Suite 300
San Antonio, TX 78216

Glenn B. Manishin
BLUMENFELD & COHEN
Attorney for VALUE-ADDED
COMMUNICATIONS, INC.
1615 M St., N. W., Suite 700
Washington, D. C. 20036

Andrew D. Lipman
Jean L. Kiddoo
Ann P. Morton
SWINDLER & BERLIN, CHARTERED
Counsel for LDDS
COMMUNICATIONS, INC.
3000 K St., N. W., Suite 300
Washington, D. C. 20007

Catherine R. Sloan
Vice President, Federal
Affairs
LDDS COMMUNICATIONS, INC.
1825 I Street, N. W.
Suite 400
Washington, D. C. 20006

John A. Ligon
Law Office of John A. Ligon
Counsel for COMTEL
COMPUTER CORPORATION
128 Mount Hebron Avenue
Post Office Box 880
Upper Montclair, NJ 07043

Martin T. McCue
General Counsel

Linda Kent
Associate General Counsel
UNITED STATES TELEPHONE ASSOCIATION
900 19th St., N. W., Suite 800
Washington, D. C. 20006-2105

Leon M. Kestenbaum
H. Richard Juhnke
Attorneys for SPRINT
COMMUNICATIONS COMPANY
1850 M Street, N. W.
11th Floor
Washington, D. C. 20036

Larry Moreland, President
c/o Caterpillar, Inc.
SDN USERS ASSOCIATION, INC.
600 W. Washington, St., AD341
East Peoria, Illinois 61630

Greg Casey
Senior Vice President,
Regulatory Affairs
Jane A. Fisher
Director, Federal Regulatory
(Acting)
INTERNATIONAL TELECHARGE, INC.
6707 Democracy Blvd.
Bethesda, MD 20817

Brad Mutschelknaus
WILEY, REIN & FIELDING
INTERNATIONAL TELECHARGE, INC.
1776 K Street, N. W.
Washington, D. C. 20006